

EXHIBIT Q

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of
GERALD CRAIG
January 11, 2018
9:12 a.m.

Taken at:
Jackson Kelley, PLLC
50 South Main Street, Suite 201
Akron, Ohio

Stephen J. DeBacco, RPR

1 Covington & Burling on behalf of McKesson
2 Corporation.

3 GERALD CRAIG, of lawful age, called for
4 examination as provided by the Federal Rules of
5 Civil Procedure, being by me first duly sworn,
6 as hereinafter certified, deposed and said as
7 follows:

8 EXAMINATION OF GERALD CRAIG

9 BY MR. BOEHM:

10 Q. Good morning, Mr. Craig.

11 A. Good morning.

12 Q. Thank you for being here. My name
13 is Paul Boehm. I represent one of the
14 Defendants, and I'll be asking you some
15 questions today.

16 We introduced ourselves before we
17 went on the record, and just wanted to do that
18 again on the record.

19 Have you ever been deposed before
20 today?

21 A. Yes.

22 Q. When was that?

23 A. Probably back in the mid-'80s.

24 Q. Have you been deposed more than
25 once?

1 suffer from addiction are addicted to more than
2 one substance?

3 MS. KEARSE: Object to form.

4 A. I'm -- I'm not -- I'm not able to
5 make that determination. I don't -- I don't
6 know. I -- I don't have that -- the question
7 you're asking is whether -- I don't know. I
8 don't know.

9 Q. You've been the head of the Summit
10 County ADAMHS Board since 2007, right?

11 A. Yes.

12 Q. You've never heard of polysubstance
13 use disorder?

14 A. I have heard of polysubstance use
15 disorder, yes.

16 Q. What does that mean?

17 A. It means that individuals use a
18 variety of substances.

19 Q. Okay. And they're addicted to a
20 variety of substances, right?

21 MS. KEARSE: Object to form.

22 Q. They're abusing more than one
23 substance, right?

24 A. So addiction is a disease, and an
25 individual who -- if -- if you -- if you

1 of the claims against Walgreens --

2 MS. KEARSE: Object to form.

3 Q. -- in the case?

4 MS. KEARSE: Object to form.

5 A. That's correct.

6 Q. Okay. Were you aware that of all
7 of the retail pharmacy chains that I've
8 mentioned, that none of them is sued in their
9 role as a pharmacy in this litigation?

10 A. No, I'm not aware of that.

11 Q. Okay. So you're not aware that
12 none of those entities is sued for its role in
13 dispensing prescription opioids?

14 MS. KEARSE: Object to form.

15 A. I'm not aware of that, yes -- or,
16 no. No, I'm not aware of that.

17 Q. Okay. Do you have any personal
18 knowledge or information about anything that
19 the whole- -- wholesale distributors did wrong
20 with respect to the prescription opioid
21 epidemic in Summit County?

22 MS. KEARSE: Object to form.

23 A. In Summit County, no.

24 Q. Okay. Over your tenure as
25 executive director of the ADAMHS Board, have